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May 23, 2019

BY ECF

The Honorable Debra Freeman
United States Magistrate Judge
U.S. District Court Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Courtroom 17A
New York, New York 10007

Re: Comm. of Pennsylvania v. Exxon Mobil Corp., et al., Case No. 14-cv-06228
Parties' Joint Proposal for Site-Specific Discovery Deadline

Dear Judge Freeman:

In response to Your Honor's Order dated May 14, 2019 (Doc. No. 461), Defendants and Plaintiff jointly propose December 1, 2020 as the deadline to complete site-specific discovery. The parties believe that this 18-month period will be sufficient time to complete discovery on the 75 focus sites, provided that all parties cooperate and timely respond to such discovery.

Per the parties' prior joint submission to Your Honor (Doc. No. 453), the remaining non-site specific discovery will be completed by May 2020, again presuming that both sides cooperate and timely respond to said discovery.

The parties appreciate the Court's consideration of this joint proposal, and will make ourselves available (either by telephone or in-person) to answer any questions, or address any concerns, that the Court may have about this or any other matter relating to the case.

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Respectfully submitted,

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cc: All Counsel of Record by LNFS

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Will & Emery**